

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20049-GAYLES

UNITED STATES OF AMERICA

v.

RONALD ZAPETE,

Defendant.

_____ /

FACTUAL PROFFER

The United States of America, the defendant Ronald Zapete (the “defendant”), and the defendant’s undersigned counsel (collectively, the “Parties”), agree that had this case proceeded to trial, the United States would have proven the following facts, among others, beyond a reasonable doubt:

On or about October 9, 2023, the defendant and another individual (“Co-Conspirator 1”) went together to a Dania Beach firearms store to purchase firearms. The defendant was not legally allowed to purchase firearms due to his immigration status as a citizen of the Dominican Republic in the United States on advanced parole. Accordingly, Co-Conspirator 1 bought three firearms.

On or about October 17, 2023, the defendant placed an order by telephone with a freight forwarder (“Company 1”) to (1) pick up a parcel from an address in North Miami—an address at which both he and Co-Conspirator 1 resided—and (2) to deliver that parcel to an address in the Dominican Republic.

Between October 17, 2023, and October 20, 2023, the defendant and Co-Conspirator 1 put one (1) Smith & Wesson MP 380mm pistol, serial number KCD3575; one (1) Glock 19 Gen 5 9mm pistol, serial number CAGZ168, one (1) FN 5.7 pistol, serial number 386465977; and 886 9mm caliber rounds, 30 380mm caliber rounds, and 13 pistol magazine cartridges in the parcel.

The defendant and Co-Conspirator 1 hid the firearms and ammunition inside a black bag and underneath bags of rice and other household goods. Two of the three firearms—the Glock and the FN 5.7—were purchased by Co-Conspirator 1 on or about October 9, 2023. Co-Conspirator 1 previously purchased the Smith and Wesson at a gun show. The three pistols are “firearms” as defined in Title 18, United States Code, Section 921(a)(3).

On or about October 20, 2023, a Company 1 truck went that same address in North Miami, in the Southern District of Florida, and accepted the parcel from the defendant. Neither the defendant, Co-Conspirator 1, nor the listed recipient of the parcel are a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms.

Between October 20, 2023 and October 31, 2023, Company 1 transported the parcel from Miami, Florida, in the Southern District of Florida, to Rio Haina in the Dominican Republic. On or about October 31, 2023, officials in the Dominican Republic inspected the parcel and found, inside, the firearms, ammunition, and magazine slides.

[REMAINDER INTENTIONALLY LEFT BLANK]

The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the undersigned Defendant's knowing, willful, and intentional plea of guilty, and the parties agree are sufficient to prove a violation of Count 1 of the Indictment beyond a reasonable doubt.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date:

3/28/2024


By:



DANIEL ROSENFELD
ASSISTANT UNITED STATES ATTORNEY

Date:

3/28/2024



MARISA TANEY
ATTORNEY FOR DEFENDANT

Date:

3/28/2024



RONALD ZAPETE
DEFENDANT